

EXHIBIT 3

From: Subashi, Darlena
Sent: Thursday, March 31, 2022 8:30 AM
To: 'Bo Davis'; Wroblewski, Karlee; 'Edward Chin'
Cc: 'Ong, Andrew'; 'BSchuman@goodwinlaw.com'; 'CLarochelle@goodwinlaw.com'; 'dkline@goodwinlaw.com'; 'Brian Craft'; 'RWalsh@goodwinlaw.com'; 'Rudy Fink'; 'Michelle Button'; 'TQDelta Listserv'; 'Christian Hurt'; 'Ty Wilson'; 'efindlay@findlaycraft.com'; Nokia309; Cummings, Dianne
Subject: RE: TQ Delta v Nokia, 2:21-CV-309-JRG - Nokia's Amended Invalidity Contentions

Bo,

As a follow-up to the meet and confer, we have reviewed our records, and counsel for Nokia were first aware of the art charted in Nokia's amended invalidity contentions beginning on February 21, 2022. That date is later for certain of the newly charted art. That is, the period during which counsel for Nokia became aware of the prior art is between February 21, 2022 and March 3, 2022. After analyzing the art, Nokia promptly informed TQ Delta via letter on March 8, 2022 and March 22, 2022 of its intent to chart the art and seek leave to amend its invalidity contentions.

Best,
Darlena

Darlena Subashi (she/her)
ALSTON & BIRD
90 Park Avenue
New York, NY 10016
Direct: 212-210-1277
Mobile: 702-290-8318
Darlena.Subashi@alston.com

From: Subashi, Darlena
Sent: Tuesday, March 29, 2022 4:39 PM
To: 'Bo Davis' <bdavis@davisfirm.com>; Wroblewski, Karlee <Karlee.Wroblewski@alston.com>; Edward Chin <echin@davisfirm.com>
Cc: Ong, Andrew <AOng@goodwinlaw.com>; BSchuman@goodwinlaw.com; CLarochelle@goodwinlaw.com; dkline@goodwinlaw.com; Brian Craft <bcraft@findlaycraft.com>; RWalsh@goodwinlaw.com; Rudy Fink <rfink@davisfirm.com>; Michelle Button <mbutton@davisfirm.com>; TQDelta Listserv <tqd@davisfirm.com>; Christian Hurt <churt@davisfirm.com>; Ty Wilson <twilson@davisfirm.com>; efindlay@findlaycraft.com; Nokia309 <Nokia309@alston.com>; Cummings, Dianne <Dianne.Cummings@alston.com>
Subject: RE: TQ Delta v Nokia, 2:21-CV-309-JRG - Nokia's Amended Invalidity Contentions

Bo,

We are available at 2pm ET tomorrow. Please use the following dial-in:

Dial-in: 1-888-525-7866
Passcode: 212-210-1277#

Best,
Darlena

Darlana Subashi (she/her)

ALSTON & BIRD

90 Park Avenue

New York, NY 10016

Direct: 212-210-1277

Mobile: 702-290-8318

Darlana.Subashi@alston.com

From: Bo Davis <bdavis@davisfirm.com>

Sent: Tuesday, March 29, 2022 12:34 PM

To: Subashi, Darlena <Darlana.Subashi@alston.com>; Wroblewski, Karlee <Karlee.Wroblewski@alston.com>; Edward Chin <echin@davisfirm.com>

Cc: Ong, Andrew <AOn@goodwinlaw.com>; BSchuman@goodwinlaw.com; CLarochelle@goodwinlaw.com; dkline@goodwinlaw.com; Brian Craft <bcraft@findlaycraft.com>; RWalsh@goodwinlaw.com; Rudy Fink <rfink@davisfirm.com>; Michelle Button <mbutton@davisfirm.com>; TQDelta Listserv <tqd@davisfirm.com>; Christian Hurt <churt@davisfirm.com>; Ty Wilson <twilson@davisfirm.com>; efindlay@findlaycraft.com; Nokia309 <Nokia309@alston.com>; Cummings, Dianne <Dianne.Cummings@alston.com>

Subject: Re: TQ Delta v Nokia, 2:21-CV-309-JRG - Nokia's Amended Invalidity Contentions

EXTERNAL SENDER – Proceed with caution

Hi Darlena,

We are available today after 2 pm ET, tomorrow from 10 – 4 pm ET, and Thursday from 10-11 ET. I can also propose some times on Friday if none of those windows work.

Thanks,

BD

From: "Subashi, Darlena" <Darlana.Subashi@alston.com>

Date: Monday, March 28, 2022 at 10:03 AM

To: "Wroblewski, Karlee" <Karlee.Wroblewski@alston.com>, Edward Chin <echin@davisfirm.com>

Cc: "Ong, Andrew" <AOn@goodwinlaw.com>, Bo Davis <bdavis@davisfirm.com>, "BSchuman@goodwinlaw.com" <BSchuman@goodwinlaw.com>, "CLarochelle@goodwinlaw.com" <CLarochelle@goodwinlaw.com>, "dkline@goodwinlaw.com" <dkline@goodwinlaw.com>, Brian Craft <bcraft@findlaycraft.com>, "RWalsh@goodwinlaw.com" <RWalsh@goodwinlaw.com>, Rudy Fink <rfink@davisfirm.com>, Michelle Button <mbutton@davisfirm.com>, TQDelta Listserv <tqd@davisfirm.com>, Christian Hurt <churt@davisfirm.com>, Ty Wilson <twilson@davisfirm.com>, Eric Findlay <efindlay@findlaycraft.com>, Nokia309 <Nokia309@alston.com>, "Cummings, Dianne" <Dianne.Cummings@alston.com>

Subject: RE: TQ Delta v Nokia, 2:21-CV-309-JRG - Nokia's Amended Invalidity Contentions

Counsel,

Further to Karlee's email below, please let us know your availability this week for a meet and confer regarding Nokia's motion for leave to amend its invalidity contentions consistent with the amended contentions that we served on March 23, 2022.

We propose meeting on Thursday, March 31, at 3pm ET. Please let us know whether that works or propose an alternative time.

Best,
Darlena

Darlena Subashi (she/her)
ALSTON & BIRD
90 Park Avenue
New York, NY 10016
Direct: 212-210-1277
Mobile: 702-290-8318
Darlena.Subashi@alston.com

From: Wroblewski, Karlee <Karlee.Wroblewski@alston.com>
Sent: Thursday, March 24, 2022 6:12 PM
To: Edward Chin <echin@davisfirm.com>; Subashi, Darlena <Darlena.Subashi@alston.com>
Cc: Ong, Andrew <A Ong@goodwinlaw.com>; Bo Davis <bdavis@davisfirm.com>; BSchuman@goodwinlaw.com; CLarochelle@goodwinlaw.com; dkline@goodwinlaw.com; Brian Craft <bcraft@findlaycraft.com>; RWalsh@goodwinlaw.com; Rudy Fink <rfink@davisfirm.com>; Michelle Button <mbutton@davisfirm.com>; TQDelta Listserv <tqd@davisfirm.com>; Christian Hurt <churt@davisfirm.com>; Ty Wilson <twilson@davisfirm.com>; efindlay@findlaycraft.com; Nokia309 <Nokia309@alston.com>; Cummings, Dianne <Dianne.Cummings@alston.com>
Subject: RE: TQ Delta v Nokia, 2:21-CV-309-JRG - Nokia's Amended Invalidity Contentions

Hi Ed,

Nokia intends to seek leave to amend its invalidity contentions next week in compliance with the local rules. We served these revised contentions now to allow TQ Delta to review prior to seeking leave to amend. Nokia consents to your showing the Alcatel prior art (designated as AEO) to your client.

Best,
Karlee

Karlee N. Wroblewski | Alston & Bird LLP
704.444.1299 office | 715.808.4562 mobile

From: Edward Chin <echin@davisfirm.com>
Sent: Thursday, March 24, 2022 5:41 PM
To: Subashi, Darlena <Darlena.Subashi@alston.com>
Cc: Ong, Andrew <A Ong@goodwinlaw.com>; Bo Davis <bdavis@davisfirm.com>; BSchuman@goodwinlaw.com; CLarochelle@goodwinlaw.com; dkline@goodwinlaw.com; Brian Craft <bcraft@findlaycraft.com>; RWalsh@goodwinlaw.com; Rudy Fink <rfink@davisfirm.com>; Michelle Button <mbutton@davisfirm.com>; TQDelta Listserv <tqd@davisfirm.com>; Christian Hurt <churt@davisfirm.com>; Ty Wilson <twilson@davisfirm.com>; efindlay@findlaycraft.com; Nokia309 <Nokia309@alston.com>; Cummings, Dianne <Dianne.Cummings@alston.com>
Subject: Re: TQ Delta v Nokia, 2:21-CV-309-JRG - Nokia's Amended Invalidity Contentions

EXTERNAL SENDER – Proceed with caution

Darlena,

Nokia's purported amended invalidity contentions violate the local rules as Nokia has not sought leave to amend. TQ Delta objects to Nokia's amended contentions. To allow our client to fully evaluate the nature of the prior art and the proposed amendments, may we share the Alcatel prior art (designated as AEO) with our client?

Thanks,

Ed

Ed Chin, Of Counsel
The Davis Firm, P.C.
213 N. Fredonia St., Suite 230
Longview, Texas 75601
office: 903-230-9090
echin@davisfirm.com

On Mar 23, 2022, at 3:00 PM, Cummings, Dianne <Dianne.Cummings@alston.com> wrote:

Counsel,

Pursuant to P.R. 3-3 & 3-4, Nokia Defendants' amended invalidity contentions are loaded to the FTP below. Nokia's accompanying document production will be served on counsel for TQ Delta under a separate cover.
The password will be sent by separate email.

Regards,

Dianne K. Cummings
Legal Administrative Assistant
ALSTON & BIRD
101 South Tryon Street, Suite 4000
Charlotte, NC 28280
704-444-1112 (O)
Dianne.Cummings@alston.com

FTP SITE ACCESS INSTRUCTIONS

To access the site using a web browser, navigate to <https://transfer.alston.com> and then provide the credentials below when prompted, being careful to not copy any trailing spaces at the end of the password. If prompted, please do not save the FTP Username and Password in your browser as this will prevent you from seeing the files (they will appear to not be present even though they are).

To access the site using a file transfer program that supports SFTP or FTPS, configure your software client to connect to transfer.alston.com and authenticate using the credentials below. FileZilla is an example of a software client that can be used (and is already installed on all A&B computers). Detailed instructions for the use of FileZilla can be found here: <https://files.alston.com/files/docs/ITSEC-Filezilla-Quickconnect-Guide.pdf>

Transfers performed either way will be protected by encryption.

Username: 3-23-2022_Revised_Inv_Co

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